



**Steven L. Beshear**  
Governor

**OFFICE OF THE 911 COORDINATOR  
COMMERCIAL MOBILE RADIO SERVICE  
EMERGENCY TELECOMMUNICATIONS BOARD  
Kentucky Office of Homeland Security  
200 Mero Street  
Frankfort, Kentucky 40601  
502-564-3911 Fax 502-564-7764  
cmrsboard.ky.gov**

**Kenneth O. Mitchell**  
Executive Director

June 27, 2008

Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

Re: Docket No. 08-51

Petition for Notice of Inquiry Regarding 911 Call Forwarding Requirements and Carriers' Blocking Options for Non-Initialized Phones

The Kentucky Office of the 9-1-1 Coordinator completely supports this Petitions' request that the Commission consider this very serious issue. Realizing there are times legitimate calls for help are received on NSI phones, alternatives that effectively manage malicious and harassing calls from NSI phones must be explored.

The call statistics enclosed reflect the diversity of the PSAPs in the Commonwealth of Kentucky that vary in size and population served. However, the Kentucky Office of the 9-1-1 Coordinator believes this data offers invaluable insight on the impact and burden NSI calls have on PSAPs across the Commonwealth. More importantly, the time taken away from real emergency calls disposing of these calls seriously threatens the safety of any citizen in true need of service.

Respectfully Submitted,

*Ken Mitchell*

Ken Mitchell  
Executive Director  
Kentucky Office of 9-1-1 Coordinator



Non-Initialized Phone data

Agency Reporting	Population	Percent KY Population
Lexington-Fayette Urban County Government	270,789	6.44%
Larue County	13,791	0.33%
Lawrence County	16,321	0.39%
Daviess County	93,613	2.23%
Oldham County	55,285	1.31%
Kentucky State Police	776,188	18.45%
Total Population served by reporting PSAPS	1,225,987	
KY Population	4,206,074	

# NON-SERVICE INITIALIZED PHONE CALL DATA

Lawrence County E911

LOCATION	<u>Louisa</u> (City)	<u>KY</u> (State)
PERIOD REPORTED	<u>5.15.08</u> (From)	<u>6.15.08</u> (Through)
Call Category	Number of NSI Calls	Percentage of Total NSI Calls
OTHER	<u>47</u>	<u>85.45%</u>
BOGUS	<u></u>	<u>0.00%</u>
THREATENING	<u>8</u>	<u>14.55%</u>
CHILD	<u></u>	<u>0.00%</u>
LEGITIMATE	<u></u>	<u>0.00%</u>
TOTAL	<u><u>55</u></u>	

## REPEAT CALLERS

The totals above include the following number of multiple calls from repeat callers:\*

Call Category	Number of NSI calls (repeat callers)	Percentage of total NSI- device 911 calls from repeat callers:
OTHER (Multiple)	<u>39</u>	<u>95.12%</u>
BOGUS (Multiple)	<u></u>	<u>0.00%</u>
THREAT (Multiple)	<u>2</u>	<u>4.88%</u>
CHILD (Multiple)	<u></u>	<u>0.00%</u>
TOTAL (Multiple)	<u><u>41</u></u>	

## NON-SERVICE INITIALIZED PHONE CALL DATA

REPORT FROM Oldham County Dispatch

LOCATION	LaGrange (City)	KY (State)
PERIOD REPORTED	5/13/2008 (From)	6/3/2008 (Through)
Call Category	Number of NSI Calls	Percentage of Total NSI Calls
OTHER (hangups)	24	80.00%
BOGUS	1	3.33%
THREATENING	0	0.00%
CHILD	4	13.33%
LEGITIMATE	1	3.33%
<b>TOTAL</b>	<b>30</b>	

### REPEAT CALLERS

The totals above include the following number of multiple calls from repeat callers:\*

Call Category		Number of NSI calls (repeat callers)	Percentage of total NSI- device 911 calls from repeat callers:
OTHER (Multiple)	(hangups)	5	45.45%
BOGUS (Multiple)		1	9.09%
THREAT (Multiple)		0	0.00%
CHILD (Multiple)		5	45.45%
<b>TOTAL (Multiple)</b>		<b>11</b>	

## NON-SERVICE INITIALIZED PHONE CALL DATA

REPORT FROM _KSP Post 1 Mayfield		
LOCATION	<u>Mayfield</u>	<u>KY</u>
	(City)	(State)
PERIOD REPORTED	<u>6/1/2008</u>	<u>6/6/2008</u>
	(From)	(Through)
<b>Call Category</b>	<b>Number of NSI Calls</b>	<b>Percentage of Total NSI Calls</b>
OTHER	<u>79</u>	<u>52.67%</u>
BOGUS	<u>          </u>	<u>0.00%</u>
THREATENING	<u>          </u>	<u>0.00%</u>
CHILD	<u>70</u>	<u>46.67%</u>
LEGITIMATE	<u>1</u>	<u>0.67%</u>
<b>TOTAL</b>	<b><u>150</u></b>	

## REPEAT CALLERS

The totals above include the following number of multiple calls from repeat callers:\*

<b>Call Category</b>	<b>Number of NSI calls (repeat callers)</b>	<b>Percentage of total NSI- device 911 calls from repeat callers:</b>
OTHER (Multiple)	<u>35</u>	<u>35.35%</u>
BOGUS (Multiple)	<u>          </u>	<u>0.00%</u>
THREAT (Multiple)	<u>          </u>	<u>0.00%</u>
CHILD (Multiple)	<u>64</u>	<u>64.65%</u>
<b>TOTAL (Multiple)</b>	<b><u>99</u></b>	

## NON-SERVICE INITIALIZED PHONE CALL DATA

REPORT FROM \_\_\_\_\_ KSP POST 2 \_\_\_\_\_

LOCATION	MADISONVILLE (City)	KY (State)
PERIOD REPORTED	5/8/2008 (From)	6/13/2008 (Through)
Call Category	Number of NSI Calls	Percentage of Total NSI Calls
OTHER	26	63.41%
BOGUS		0.00%
THREATENING		0.00%
CHILD	15	36.59%
LEGITIMATE		0.00%
<b>TOTAL</b>	<b>41</b>	

### REPEAT CALLERS

The totals above include the following number of multiple calls from repeat callers:\*

Call Category	Number of NSI calls (repeat callers)	Percentage of total NSI- device 911 calls from repeat callers:
OTHER (Multiple)	11	55.00%
BOGUS (Multiple)		0.00%
THREAT (Multiple)		0.00%
CHILD (Multiple)	9	45.00%
<b>TOTAL (Multiple)</b>	<b>20</b>	

NON-SERVICE INITIALIZED PHONE CALL DATA

REPORT FROM Kentucky State Police - Post 3

LOCATION	<u>Bowling Green</u> (City)	<u>Kentucky</u> (State)
PERIOD REPORTED	<u>19-May</u> (From)	<u>13-Jun</u> (Through)
Call Category	Number of NSI Calls	Percentage of Total NSI Calls
OTHER	<u>16</u>	<u>100.00%</u>
BOGUS	<u>0</u>	<u>0.00%</u>
THREATENING	<u>0</u>	<u>0.00%</u>
CHILD	<u>0</u>	<u>0.00%</u>
LEGITIMATE	<u>0</u>	<u>0.00%</u>
TOTAL	<u>16</u>	
REPEAT CALLERS		

The totals above include the following number of multiple calls from repeat callers:\*

Call Category	Number of NSI calls (repeat callers)	Percentage of total NSI- device 911 calls from repeat callers:
OTHER (Multiple)	<u>7</u>	<u>100.00%</u>
BOGUS (Multiple)	<u></u>	<u>0.00%</u>
THREAT (Multiple)	<u></u>	<u>0.00%</u>
CHILD (Multiple)	<u></u>	<u>0.00%</u>
TOTAL (Multiple)	<u>7</u>	

NON-SERVICE INITIALIZED PHONE CALL DATA

REPORT FROM KY STATE POLICE POST 5

LOCATION	<u>CAMPBELLSBURG</u> (City)	<u>KY</u> (State)
PERIOD REPORTED	<u>9-May-08</u> (From)	<u>8-Jun-08</u> (Through)
Call Category	Number of NSI Calls	Percentage of Total NSI Calls
OTHER	<u>198</u>	<u>95.19%</u>
BOGUS	<u></u>	<u>0.00%</u>
THREATENING	<u></u>	<u>0.00%</u>
CHILD	<u>8</u>	<u>3.85%</u>
LEGITIMATE	<u>2</u>	<u>0.96%</u>
<b>TOTAL</b>	<b><u>208</u></b>	

**REPEAT CALLERS**

The totals above include the following number of multiple calls from repeat callers:\*

Call Category	Number of NSI calls (repeat callers)	Percentage of total NSI- device 911 calls from repeat callers:
OTHER (Multiple)	<u>105</u>	<u>92.92%</u>
BOGUS (Multiple)	<u></u>	<u>0.00%</u>
THREAT (Multiple)	<u></u>	<u>0.00%</u>
CHILD (Multiple)	<u>8</u>	<u>7.08%</u>
<b>TOTAL (Multiple)</b>	<b><u>113</u></b>	

**NON-SERVICE INITIALIZED PHONE CALL DATA**

REPORT FROM KSP Dry Ridge



LOCATION	<u>Dry Ridge</u> (City)	<u>Kentucky</u> (State)
PERIOD REPORTED	<u>5/13/2008</u> (From)	<u>5/31/2008</u> (Through)
<b>Call Category</b>	<b>Number of NSI Calls</b>	<b>Percentage of Total NSI Calls</b>
OTHER	<u>111</u>	<u>100.00%</u>
BOGUS	<u>          </u>	<u>0.00%</u>
THREATENING	<u>          </u>	<u>0.00%</u>
CHILD	<u>          </u>	<u>0.00%</u>
LEGITIMATE	<u>          </u>	<u>0.00%</u>
<b>TOTAL</b>	<b><u>111</u></b>	

#### REPEAT CALLERS

The totals above include the following number of multiple calls from repeat callers:\*

<b>Call Category</b>	<b>Number of NSI calls (repeat callers)</b>	<b>Percentage of total NSI- device 911 calls from repeat callers:</b>
OTHER (Multiple)	<u>24</u>	<u>100.00%</u>
BOGUS (Multiple)	<u>          </u>	<u>0.00%</u>
THREAT (Multiple)	<u>          </u>	<u>0.00%</u>
CHILD (Multiple)	<u>          </u>	<u>0.00%</u>
<b>TOTAL (Multiple)</b>	<b><u>24</u></b>	

#### NON-SERVICE INITIALIZED PHONE CALL DATA

REPORT FROM:

KSP Morehead, Post 8

LOCATION	<u>Morehead</u> (City)	<u>KY</u> (State)
PERIOD REPORTED	<u>5/8/2008</u> (From)	<u>6/2/2008</u> (Through)
<b>Call Category</b>	<b>Number of NSI Calls</b>	<b>Percentage of Total NSI Calls</b>
OTHER	<u>288</u>	<u>52.65%</u>
BOGUS	<u>123</u>	<u>22.49%</u>
THREATENING	<u>0</u>	<u>0.00%</u>
CHILD	<u>15</u>	<u>2.74%</u>
LEGITIMATE	<u>121</u>	<u>22.12%</u>
<b>TOTAL</b>	<b><u>547</u></b>	
<b>REPEAT CALLERS</b>		

The totals above include the following number of multiple calls from repeat callers:\*

<b>Call Category</b>	<b>Number of NSI calls (repeat callers)</b>	<b>Percentage of total NSI- device 911 calls from repeat callers:</b>
OTHER (Multiple)	<u>                    </u>	<u>                    </u>
BOGUS (Multiple)	<u>                    </u>	<u>                    </u>
THREAT (Multiple)	<u>                    </u>	<u>                    </u>
CHILD (Multiple)	<u>                    </u>	<u>                    </u>
<b>TOTAL (Multiple)</b>	<b><u>0</u></b>	

## NON-SERVICE INITIALIZED PHONE CALL DATA

REPORT FROM \_KSP 10 Harlan\_\_\_\_\_

	LOCATION	HARLAN	KY
		(City)	(State)
	PERIOD REPORTED	5/8/2008	6/2/2008
		(From)	(Through)
Call Category		Number of NSI Calls	Percentage of Total NSI Calls
OTHER		6	1.13%
BOGUS		520	97.56%
THREATENING		2	0.38%
CHILD		5	0.94%
LEGITIMATE		0	0.00%
<b>TOTAL</b>		<b>533</b>	

#### REPEAT CALLERS

The totals above include the following number of multiple calls from repeat callers:\*

Call Category	Number of NSI calls (repeat callers)	Percentage of total NSI- device 911 calls from repeat callers:
OTHER (Multiple)	0	0.00%
BOGUS (Multiple)	62	96.88%
THREAT (Multiple)	1	1.56%
CHILD (Multiple)	1	1.56%
<b>TOTAL (Multiple)</b>	<b>64</b>	

#### NON- INITIALIZED PHONE CALL DATA

REPORT FROM <b>KSP POST 11</b>		
LOCATION	LONDON	KY
	(City)	(State)

Call Category	PERIOD REPORTED	5/9/2008 (From)	6/2/2008 (Through)
		Number of NSI Calls	Percentage of Total NSI Calls
OTHER		66	64.08%
BOGUS		0	0.00%
THREATENING		0	0.00%
CHILD		33	32.04%
LEGITIMATE		4	3.88%
<b>TOTAL</b>		<b>103</b>	

### REPEAT CALLERS

The totals above include the following number of multiple calls from repeat callers:\*

Call Category	Number of NSI calls (repeat callers)	Percentage of total NSI- device 911 calls from repeat callers:
OTHER (Multiple)	30	49.18%
BOGUS (Multiple)	0	0.00%
THREAT (Multiple)	0	0.00%
CHILD (Multiple)	31	50.82%
<b>TOTAL (Multiple)</b>	<b>61</b>	

### NON-SERVICE INITIALIZED PHONE CALL DATA

REPORT FROM Kentucky State Police Post 12

LOCATION	Frankfort (City)	KY (State)
PERIOD REPORTED	5/13/2008	6/11/2008

	(From)	(Through)
Call Category	Number of NSI Calls	Percentage of Total NSI Calls
OTHER	156	91.76%
BOGUS		0.00%
THREATENING		0.00%
CHILD	6	3.53%
LEGITIMATE	8	4.71%
<b>TOTAL</b>	<b>170</b>	

### REPEAT CALLERS

The totals above include the following number of multiple calls from repeat callers:\*

Call Category	Number of NSI calls (repeat callers)	Percentage of total NSI- device 911 calls from repeat callers:
OTHER (Multiple)	68	97.14%
BOGUS (Multiple)		0.00%
THREAT (Multiple)		0.00%
CHILD (Multiple)	2	2.86%
<b>TOTAL (Multiple)</b>	<b>70</b>	

### NON-SERVICE INITIALIZED PHONE CALL DATA

#### KSP HAZARD

LOCATION	100 JUSTICE DR., HAZARD (City)	KY (State)
PERIOD REPORTED	5/11/2008 (From)	6/11/2008 (Through)

Call Category	Number of NSI Calls	Percentage of Total NSI Calls
OTHER	<u>127</u>	<u>88.81%</u>
BOGUS	<u>1</u>	<u>0.70%</u>
THREATENING	<u>0</u>	<u>0.00%</u>
CHILD	<u>15</u>	<u>10.49%</u>
LEGITIMATE	<u>0</u>	<u>0.00%</u>
<b>TOTAL</b>	<b><u><u>143</u></u></b>	

### REPEAT CALLERS

The totals above include the following number of multiple calls from repeat callers:\*

Call Category	Number of NSI calls (repeat callers)	Percentage of total NSI- device 911 calls from repeat callers:
OTHER (Multiple)	<u>25</u>	<u>92.59%</u>
BOGUS (Multiple)	<u></u>	<u>0.00%</u>
THREAT (Multiple)	<u></u>	<u>0.00%</u>
CHILD (Multiple)	<u>2</u>	<u>7.41%</u>
<b>TOTAL (Multiple)</b>	<b><u><u>27</u></u></b>	

### NON-SERVICE INITIALIZED PHONE CALL DATA

REPORT FROM _KSP15 Columbia		
LOCATION	<u>Columbia</u> (City)	<u>Ky</u> (State)
PERIOD REPORTED	<u>5/12/2008</u> (From)	<u>5/30/2008</u> (Through)
Call Category	Number of	Percentage of

	NSI Calls	Total NSI Calls
OTHER	<u>0</u>	<u>0.00%</u>
BOGUS	<u>5</u>	<u>71.30%</u>
THREATENING	<u>0</u>	<u>0.00%</u>
CHILD	<u>1</u>	<u>28.70%</u>
LEGITIMATE	<u>0</u>	<u>0.00%</u>
<b>TOTAL</b>	<u><u>6</u></u>	

### REPEAT CALLERS

The totals above include the following number of multiple calls from repeat callers:\*

Call Category	Number of NSI calls (repeat callers)	Percentage of total NSI-device 911 calls from repeat callers:
OTHER (Multiple)	<u>0</u>	<u>0.00%</u>
BOGUS (Multiple)	<u>0</u>	<u>0.00%</u>
THREAT (Multiple)	<u>0</u>	<u>0.00%</u>
CHILD (Multiple)	<u>0</u>	<u>0.00%</u>
<b>TOTAL (Multiple)</b>	<u><u>0</u></u>	

### NON-SERVICE INITIALIZED PHONE CALL DATA

REPORT FROM KSP 16 Henderson

LOCATION	<u>HENDERSON</u> (City)	<u>KY</u> (State)
PERIOD REPORTED	<u>12-May</u> (From)	<u>30-May</u> (Through)

Call Category	Number of NSI Calls	Percentage of Total NSI Calls
OTHER	6	4.29%
BOGUS	98	70.00%
THREATENING	0	0.00%
CHILD	36	25.71%
LEGITIMATE	0	0.00%
<b>TOTAL</b>	<b>140</b>	

**REPEAT CALLERS**

The totals above include the following number of multiple calls from repeat callers:\*

Call Category	Number of NSI calls (repeat callers)	Percentage of total NSI- device 911 calls from repeat callers:
OTHER (Multiple)	4	5.33%
BOGUS (Multiple)	39	52.00%
THREAT (Multiple)	0	0.00%
CHILD (Multiple)	32	42.67%
<b>TOTAL (Multiple)</b>	<b>75</b>	

**From:** David Lucas [mailto:davidl@lfucg.com]

**Sent:** Friday, May 16, 2008 10:07 AM

**To:** Robinson, Denisa (GOV Office KOHS-CMRS)

**Subject:** FW: FW: FCC Notice of Inquiry regarding Non-Initialized phone

Below are the call counts for non-initialized phones in Lexington. 2005 reflects a partial year since we did not get call counting software fully operational until late 2005.

Non-Initialized calls

2004 - No Data

2005 - 2,283 (Partial Year)

Total 911 calls

No Data

237,119



2006 - 15,422	221,504
2007 - 16,050	218,586
2008 - 6,419 (Jan - Apr)	50,508 (Jan – Mar)

Basically, we are running in the 7% of 911 calls coming from these units. We are trying to verify the count of emergencies from these units. I expect a < 5% count.

David S Lucas, ENP GISP

Director of Enhanced 9-1-1  
Lexington-Fayette Urban County Gov't  
200 E Main Street, Rm 320  
Lexington, KY 40507  
Tele: 859-258-3380